

GOULSTON & STORRS PC  
400 Atlantic Avenue  
Boston, MA 02110  
(617) 482-1776  
Douglas B. Rosner (DR-5690)  
Gregory O. Kaden(GK-9610)

Counsel to Rogge Global Partners PLC

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: Case No. 08-13555 (JMP)  
LEHMAN BROTHERS HOLDINGS, INC., :  
*et al.*, :  
: Debtors : (Jointly Administered)  
-----X

**JOINDER OF ROGGE GLOBAL PARTNERS PLC IN OBJECTION OF CREDITORS  
TO THE DEBTORS' MOTION TO ALLOW DISCLOSURE OF  
THE DERIVATIVE QUESTIONNAIRES**

Rogge Global Partners PLC ("Rogge") on behalf of itself and its present or former clients identified on Exhibit A hereto (collectively, the "Rogge Clients") that have submitted Derivative Questionnaires<sup>1</sup> and/or guarantee questionnaires (collectively, the "Questionnaires") in these chapter 11 cases, by and through its undersigned counsel, hereby joins in the Objection of Creditors [ECF Docket No. 49132] (the "Creditor Objection") to the Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code [ECF Docket No. 48939] (the "Motion") as follows:

1. Pursuant to the Bar Date Order, Rogge submitted Questionnaires in connection with the proofs of claim it had filed on behalf of the Rogge Clients. The Questionnaires included confidential and proprietary information. Based on the express language of the Bar Date Order,

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Rogge believed that such information would be accessible only to the Debtors, the Creditors' Committee and their respective advisors and counsel.

2. Rogge hereby joins in the Creditor Objection and, to the extent applicable to Rogge and the Rogge Clients, hereby incorporates by reference the arguments set forth therein.

WHEREFORE, for the foregoing reasons, Rogge respectfully requests that this Court: (i) deny the Motion; (ii) alternatively, if the Court grants the Motion, direct Debtors to redact all identifying, confidential and proprietary information from any documents disclosed; and (iii) grant such other or further relief as may be appropriate under the circumstances..

Dated: April 6, 2015

/s/ Gregory O. Kaden  
Gregory O. Kaden (GK-9610)  
GOULSTON & STORRS PC  
400 Atlantic Avenue  
Boston, MA 02110-3333  
Tel: (617) 482-1776  
Fax: (617) 574-4112

**EXHIBIT A**

**Saudi Arabian Monetary Agency**  
**ABN AMRO Bank NV (Stichting Pensioenfonds van de)**  
**BAA Pension Trust Company Ltd.**  
**Boehringer Ingelheim**  
**Stichting Pensionfonds Apothekers**  
**Stichting Pensionfonds ENCI**  
**Reid Street Retirement Global Bond Fund**  
**Singapore Press Holdings**  
**Sutter Health- Eden Account**  
**Woo Hay Tong Investments Ltd.**  
**Trafalgar House**

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: :  
Debtors : (Jointly Administered)  
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**CERTIFICATE OF SERVICE**

I, Gregory O. Kaden, hereby certify that on the 6<sup>th</sup> day of April, 2015, I caused to be served a copy of the *Joinder of Rogge Global Partners PLC in Objection of Creditors to Debtors' Motion to Allow Disclosure of the Derivative Questionnaires* via the Court's CM/ECF system on the attached service list.

Dated: April 6, 2015

/s/ Gregory O. Kaden  
Gregory O. Kaden (GK-9610)  
GOULSTON & STORRS PC  
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Boston, MA 02110-3333  
Tel: (617) 482-1776  
Fax: (617) 574-4112

**Service List**

Curtis, Mallet-Prevost, Colt & Mosle LLP  
101 Park Avenue  
New York, NY 10178  
Attn: Turner P. Smith and Peter J. Behmke  
**Counsel to LBHI and certain affiliates**

Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Avenue  
22<sup>nd</sup> Floor  
New York, NY 10010  
Attn: Andrew J. Rossman  
**Counsel to Creditors Committee**

Office of the US Trustee for Region 2  
201 Varick Street  
Suite 1006  
New York, NY 10014  
Attn: William K. Harrington, Susan Golden and Andrea B. Schwartz